## **Exhibit C**

RE '755 – CLAIM 9 and 13 (below)							
	AERO-FLAP PART No.	033- 08001	033- 08002	033- 08004			
a	A mudflap for preventing spray from a wheel of a vehicle on a wet roadway from impairing the vision of drivers of other vehicles, comprising a vertically extending flap,	YES	YES	YES			
b	a plurality of laterally spaced, vertically extending, tapered vanes with inwardly and rearwardly inclined lateral surfaces that define a plurality of vertically extending channels for carrying water and debris striking the front side of the flap in a downward direction, and	SEE NOTES	YES	YES			
С	vertically extending slotted openings with inclined side walls which permit air to pass from the channels through the flap and prevent water and debris from doing so.	SEE NOTES	YES	YES			

## Notes

- (1) Part No. 033-08001 is a modification of either Part No. 033-08002 or 033-08004. The undisputable material truth is that Plaintiff ordered a mold from Viking Tool<sup>3</sup> that can only produce Part No. 033-08002 and 033-08004. Plaintiff purchases these two mud flaps from the injection molder, H S Die & Engineering Inc;<sup>4</sup> and then modify them in house for different configurations.
- (2) Therefore part no. 033-08001 also literally infringes Surti's '755 patent.
- (3) Part No. 033-08001 should also be covered under the "Doctrine of Equivalents" because even though its vanes, channels and slotted openings are not vertical, they prevent while directing water and debris from the wheel in downward direction towards the ground and not to the rear or sides of the flap. (ECF No. 193 filed 09/03/15 PageID.2047 to 2052 —Paragraph 31-42)

	RE '755 – CLAIM 13					
	AERO-FLAP PART No.	033-08001	033-08002	033-08004		
а	The mud flap of claim 9 wherein the					
	slotted openings are arranged end-to-	YES	YES	YES		
	end in vertically extending rows in the					
	channels between the vanes.					

<sup>&</sup>lt;sup>3</sup> FLEET 000962

<sup>&</sup>lt;sup>4</sup> FLEET 000954